



Law Offices of  
BARRY R. FEERST & ASSOCIATES

Barry R. Feerst, Esq.  
Marc Illish, Esq.  
Yitzchok Kotkes, Esq.  
Alham Usman, Esq.

194 South 8th Street  
Brooklyn, NY 11211  
(t) 718-384-9111  
(f) 718-384-5999

By ECF

November 7, 2018

The Honorable Judge Ann M. Donnelly,  
United States District Judge, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Shaulov v. The State of New York, et al.  
1:18-cv-04151-AMD-PK

Dear Judge Donnelly:

This firm represents the plaintiff in the above referenced action and I write in response to defendants' pre-motion letters requesting a pre-motion conference seeking leave to file pre-answer motions to dismiss the complaint under Fed. R. Civ. P. 12(b).

Having reviewed defendants' letters, plaintiff respectfully requests leave from this Court to file an amended complaint, pursuant to Rule 15(a), which we believe will resolve the issues raised in the letters. Accordingly, plaintiff respectfully requests that he be afforded a period of 30 days to file the amended complaint, and that the pre-motion conference addressing defendants' present pre-motion letters be deferred until after the amended complaint is filed, at which point they will be superseded by the amended complaint.

No previous extension requests have been made.

We thank you for your time and consideration of this matter.

Very truly yours,  
  
BARRY R. FEERST

cc: All counsel of record via ECF